

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division

UNITED STATES OF AMERICA) CRIMINAL NO. 2:19cr 67
)
)
 v.) 33 U.S.C. § 1319(c)(4)
)
 MONICA BOROWICZ,) Clean Water Act False Statements
)
 Defendant.) (Count 1)
)
) 18 U.S.C. § 981(a)(1)(C)
)
) Criminal Forfeiture
)

CRIMINAL INFORMATION
(Felony)

THE UNITED STATES ATTORNEY CHARGES THAT:

COUNT ONE

From in or about April 2014, through in or about March 2018, the exact dates being unknown, in the Eastern District of Virginia, and elsewhere, the defendant, MONICA BOROWICZ, knowingly caused false material statements, representations, and certifications to be made in records, reports, and other documents filed and required to be maintained under the Clean Water Act (33 U.S.C. § 1251, *et. seq.*) and the regulations promulgated thereunder, that is, the defendant, MONICA BOROWICZ, knowingly caused to be reported in monthly Discharge Monitoring Reports (DMR) for the NASA Wallops Island Flight Facility, submitted to the Virginia Department of Environmental Quality, false test results for Total Kjeldahl Nitrogen (TKN) levels being discharged from the NASA Wallops Island Flight Facility into the navigable waters of the United States and Virginia.

(In violation of Title 33, United States Code, Section 1319(c)(4).)

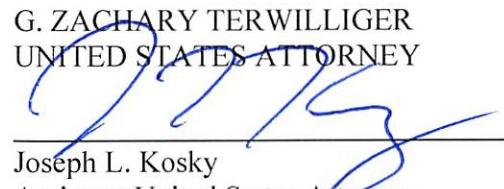
FORFEITURE

1. The defendant, if convicted of the single violation alleged in this Criminal Information, shall forfeit to the United States, as part of the sentencing pursuant to Federal Rule of Criminal Procedure 32.2, any property, real or personal, which constitutes or is derived from proceeds traceable to the violation.
2. If any property that is subject to forfeiture above, as a result of any act or omission of the defendant, (a) cannot be located upon the exercise of due diligence, (b) has been transferred to, sold to, or deposited with a third party, (c) has been placed beyond the jurisdiction of the Court, (d) has been substantially diminished in value, or (e) has been commingled with other property that cannot be divided without difficulty, it is the intention of the United States to seek forfeiture of any other property of the defendant, as subject to forfeiture under Title 21, United States Code, Section 853(p).

(In accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461.)

G. ZACHARY TERWILLIGER
UNITED STATES ATTORNEY

By:


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